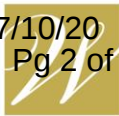


Exhibit C



WAGNERS
A SERIOUS INJURY LAW FIRM

RAYMOND F. WAGNER, Q.C.
902.425.7330

Class Action Paralegals:
Victor Lewin - viclewin@wagners.co
Dayna MacGillivray - dmacgillivray@wagners.co
Richard Crossman - rcrossman@wagners.co

Exhibit C

September 16, 2018

VIA EMAIL

Peter Lawless / Mollie Margetts
Government of British Columbia
HSS - Health and Social Services
PO Box 9280 Stn
Prov Govt
Victoria, BC V8W 9J7
Peter.Lawless@gov.bc.ca
Mollie.Margetts@gov.bc.ca

Kristin Smith / Rita Bambers
Sonal Gandhi
Macdonald-Cartier Bldg
49 Place d'Armes, 2nd Floor,
Kingston, ON K7L 5J3
Kristin.Smith@ontario.ca
Rita.Bambers@ontario.ca
Sonal.Gandhi@ontario.ca

Dear Provincial Health Insurer Representatives:

Re: OxyContin Class Actions

We write to inform you that due to recent developments in this matter, we as Class Counsel have been put in a position of conflict with respect to our obligation to protect the subrogated claims of the PHIs in the course of our representation of the representative plaintiffs and Class Members. It is in the best interest of all parties that we confirm that we do not act for the PHIs and recommend that they seek independent counsel. Independent counsel appears to have already been retained.

There are two reasons that we now find ourselves in conflict.

First, our view is that, notwithstanding the absence of Court approval in Saskatchewan, there remains a valid contractual agreement with the Defendants that binds the PHIs to the terms of that agreement and release. You have communicated to us, both by way of letter and at the September 5, 2018 case management teleconference with Justice Barrington-Foote, that you take a contrary position and will not be providing further evidence of your approval of the settlement. In executing the Settlement Agreement, we represented to the Defendants that we had express authority to accept the agreement pertaining to the PHIs interests on the PHIs' behalf, which we did. We cannot now resile from the agreement and its attendant obligations, and it is contrary to the interests of the representative plaintiffs and the Class Members to do so. As such, we will deliver additional evidence at a further approval hearing before Justice Barrington-Foote. Although the evidence we expect to deliver is already substantially in the public domain, we are of the opinion that we may not be able to protect the position of the representative plaintiffs and the class if we continue to represent the PHIs.

Page 2

September 16, 2018

Second, on August 29, 2018 a proposed class action was filed in the Supreme Court of British Columbia by Her Majesty the Queen in Right of the Province of British Columbia, on behalf of itself and all federal, provincial and territorial governments and agencies. The nature of the relief you are seeking under this proposed class action appears to overlap with the relief provided to the PHIs by the Defendants in the *Perdikaris* settlement. We are of the view that the filing of the BC class action is contrary to the instructions you provided to us to accept the *Perdikaris* settlement, including the terms of the release. Accordingly, this raises a conflict between PHIs and Class Members.

We believe it necessary to clarify the divergence of the interests of the PHIs and the representative plaintiffs and the Class so that we may advance the further application to Justice Barrington-Foote to approve the *Perdikaris* settlement and obtain resolution for Class Members without further delay. Please note that we intend to provide our position in this respect to Justice Barrington-Foote at the case management conference on September 20, 2018.

We invite any questions or comments you may have after reviewing our position.

Yours truly,



Raymond F. Wagner, Q.C.

RFW/vcl

cc: Joel Rochon - jrochon@rochongenova.com
Michael Robb - michael.robb@siskinds.com
Emilie E. M. Maxwell - emilie.maxwell@siskinds.com
Maddy Carter - mcarter@wagners.co
Kate Boyle - kboyle@wagners.co